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131

Chapter 11

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

Case No. 19-23649 (RDD)

(Jointly Administered)

In re:

PURDUE PHARMA L.P., et al.,

Debtors.

CREDITORS THE BOARD OF EDUCATION OF THORNTON TOWNSHIP HIGH
SCHOOLS, ILLINOIS DISTRICT NO. 205, THE BOARD OF EDUCATION OF
THORNTON FRACTIONAL TOWNSHIP HIGH SCHOOLS, ILLINOIS DISTRICT NO.
215, AND THE BOARD OF EDUCATION OF EAST AURORA, ILLINOIS SCHOOL
DISTRICT NO. 131'S MOTION TO SHORTEN THE TIME PERIOD FOR NOTICE OF
HEARING ON MOTION TO SUBMIT CLAIMS TO MEDIATION¹

The Board of Education of Thornton Township High Schools, Illinois District No. 205;
The Board of Education of Thornton Fractional Township High Schools, Illinois District No.
215; and The Board of Education of East Aurora, Illinois School District No. 131 (collectively
the “**Independent Public School Districts**”), creditors in these proceedings, respectfully

¹ The Motion to Submit Claims to Mediation is filed concurrent herewith.

represent as follows in support of this Motion, for the relief set forth in the proposed Order attached hereto as Exhibit 1:

1. On March 30, 2020, Creditor Board of Chicago School District No. 299 (“Chicago Public Schools” or “CPS”) filed a Motion to Submit Claim to Mediation [Dkt. No 998], on behalf of itself and all members of a Class of independent public school districts, of which the Independent Public School Districts bringing this Motion are members.

2. On April 9, 2020, the Independent Public School Districts filed a Motion to Join and Support the Motion to Submit Independent Public School Claims to Mediation [Dkt. No. 1025], requesting that the Court enter an Order granting CPS’s Motion to Submit Claim to Mediation and adding the Independent Public School Districts as co-representatives of the Class of independent public schools.

3. On April 13, 2020, CPS withdrew its Motion to Submit Claim for Mediation.

4. The Independent Public School Districts now file a Motion to Submit Claims to Mediation, which is substantially identical to the Motion filed by CPS on March 30, 2020.

5. The Independent Public School Districts’ Motion to Submit Claims to Mediation does not introduce any issues or arguments that were not presented in the March 30, 2020 Motion.

6. Counsel for the undersigned has been in active discussions with counsel for various creditor committees and Debtors’ counsel in an effort to resolve this matter by agreement. At the time of filing this Motion those discussions are ongoing and productive.

7. In order to foster further ongoing discussion, the parties have been discussing a briefing schedule in which the deadline for objections to the underlying motion would be filed by April 17, 2020 at 5 pm and any Reply would be filed by April 20, 2020 by 5 pm while maintaining

the hearing date of April 22, 2020. The meet and confer regarding this Motion and the timetable are ongoing but nearing completion.

8. Based on the foregoing, shortening the time period for notice of the hearing on the current Motion will not prejudice the parties in any way. Denial of this motion, however, will cause unnecessary delay, as it will require the Independent Public School Districts to wait until May 22, 2020, the following Omnibus Hearing Date, to seek the relief requested.

WHEREFORE, the Independent Public School Districts respectfully request that this Court enter an Order granting their request to shorten the time period for notice of hearing of the Motion to Submit Claims to Mediation and allowing them to be heard on April 22, 2020.

Dated: April 13, 2020

Respectfully Submitted,

By: /s/ Chiung-Hui Huang
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